



July 14, 2014

Federal Communications Commission
445 12th Street
Washington, DC 20554

ATTENTION:

Chelsea H. Fallon, Assistance Chief
John Emmett, GIS Specialist
Wireline Competition Bureau
Industry Analysis & Technology Division

RE: WC Docket Nos. 10-90 and 05-337

In response to your inquiry dated June 20, 2014, please be advised that Madison Telephone Company, Inc. (SAC 341049) wishes to inform the FCC that the overlaps reported by AT&T to the boundary maps are not due to any lack of effort on behalf of Madison Telephone Company, Inc. to comply with the FCC's requirement.

Pursuant to the Public Notices released on December 2, 2013 and January 9, 2014,¹ we have confirmed that the study area boundary which we certified is, in fact, correct and contacted AT&T, directly in a timely manner regarding the overlap. Upon receiving contact from AT&T and the FCC, Madison executed a Non-Disclosure Agreement at AT&T's request in order to review AT&T "GeoResults". As stated in the Dec. 2, 2013 PN, the FCC granted AT&T "complete confidentiality" for its study area boundaries in the state of Illinois and did not publish AT&T's study areas in the online map.² According to the procedures established in this notice, the Wireline Competition Bureau was to provide AT&T with map data "indicating the areas where its study area boundaries overlap or create a void with the study area boundaries of neighboring ILECs, based on the submitted data."³ AT&T is then expected "to interact with these ILECs in a timely fashion in order to provide them with an opportunity to review the overlaps and voids, address any boundary issues, and submit modified boundaries as necessary and described above."⁴ The notice further stated, "AT&T must work with the neighboring ILECs (and the relevant state commissions, if necessary) so that they can resubmit and recertify corrected study area boundaries by January 13, 2014."⁵

¹ See Wireline Competition Bureau Publishes Online Map of Submitted Study Area Boundaries, Announces Procedures for Filing Revised Data, WC Docket Nos. 10-90 and 05-337, Public Notice, DA 13-2296 (rel. Dec. 2, 2013) ("Dec. 2, 2013 PN"). See also, *Connect America Fund*, Docket No. 10-90 and *High-Cost Universal Service Support*, Docket No. 05-337, Order (rel. Jan. 9, 2014).

² Dec. 2, 2013 PN

³ *Id.*

⁴ *Id.*

⁵ *Id.*

This is not, however, what has occurred. Madison Telephone Company has not received follow-up information from AT&T to coordinate a review. Although electronic correspondence has been forwarded to AT&T requesting to review the "purported discrepancy", Madison Telephone Company, as of July 8, 2014, has:

- Not been provided any information to review from AT&T
- Not received a mutually executed NDA – that AT&T requested
- Not received further electronic or written correspondence from AT&T

Other than the reminders received from the FCC asking Madison to review the AT&T boundary discrepancy, Madison diligently continued to review the FCC's electronic database housing the boundary discrepancies in lieu of Madison Telephone Company receiving AT&T's data. Thus there are no remaining alternatives to resolve the FCC's request(s).

Madison Telephone Company has allowed AT&T the opportunity to provide a copy of their signed NDA and to submit a corresponding data set that allows for a diligent review of the ILEC boundary(s) supposedly in dispute. Upon receipt of your June 20, 2014 correspondence, Madison once again submitted a request to AT&T for the mutual NDA to be executed and for the AT&T GeoResults to be forwarded to Madison Telephone Company for review.

Madison Telephone Company followed up by telephone call on July 8, 2014 and the AT&T representative requesting the NDA indicated it was forwarded to an outsourced service for response. Madison Telephone Company confirmed in that conversation that it was obligated to respond to the FCC by July 14, 2014 regarding the boundary dispute. Although confirmation of Madison's request was confirmed as being received, no further commitment regarding the receipt of GeoResults information could be provided to Madison.

Madison Telephone Company can only submit and plead that the FCC consider requiring AT&T to utilize the very same "streamlined" process proposed to Madison to make the appropriate AT&T boundary adjustments needed to satisfy the certified information provided by Madison Telephone Company. Please contact the undersigned with any questions regarding this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Robert W. Schwartz", with a stylized flourish at the end.

Robert W. Schwartz
President
Madison Telephone Company